IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA EASTERN DIVISION

RODNEY D. PIERCE and MOSES MATTHEWS,

Plaintiffs,

v.

Case No. 4:23-cv-193-D

THE NORTH CAROLINA STATE BOARD OF ELECTIONS, et al.,

Defendants.

NOTICE OF FILING OF PROPOSED CONCLUSIONS OF LAW

Defendants Philip E. Berger and Destin Hall, both in their official capacities ("Legislative Defendants"), by and through undersigned counsel and pursuant to this Court's Scheduling Order as amended, D.E. 81 and D.E. 113, hereby give notice of filing of their Proposed Conclusions of Law, which accompany Legislative Defendants' Proposed Findings of Fact, D.E. 124, but which are filed separately herewith as **Exhibit A** due to file size constraints.

Respectfully submitted, this the 14th day of March, 2025.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:/s/ Phillip J. Strach
Phillip J. Strach
North Carolina State Bar no. 29456
Alyssa M. Riggins
North Carolina State Bar no. 52366
Cassie A. Holt
North Carolina State Bar no. 56505
Jordan A. Koonts
North Carolina State Bar no. 59363
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603

Ph: (919) 329-3800 phil.strach@nelsonmullins.com alyssa.riggins@nelsonmullins.com cassie.holt@nelsonmullins.com jordan.koonts@nelsonmullins.com

BAKER & HOSTETLER LLP

By: /s/Katherine L. McKnight Katherine L. McKnight* D.C. Bar No 994456 1050 Connecticut Ave. NW, Suite 1100 Washington DC 20036 Ph: (202) 861-1500 kmcknight@bakerlaw.com

Patrick T. Lewis* Ohio State Bar no. 0078314 127 Public Square, Suite 2000 Cleveland, Ohio 44114 Ph: (216) 621-0200 plewis@bakerlaw.com

Erika Dackin Prouty* Ohio State Bar No. 0095821 200 Civic Center Drive, Suite 1200 Columbus, OH 43215 (614) 462-4710 eprouty@bakerlaw.com

* Appeared via Special Notice Attorneys for Legislative Defendants **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of Court

using the CM/ECF system, which will send notification of such filing to all counsel and parties

registered in said system.

Respectfully submitted this, the 14th day of March, 2025.

/s/ Phillip J. Strach

Phillip J. Strach